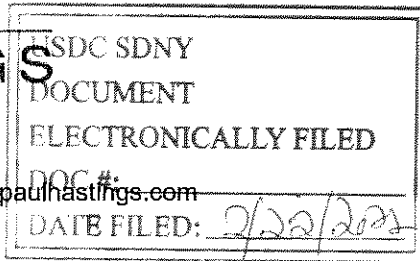


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Granted

Colleen McMahon
2/22/2022

February 18, 2022

The Honorable Colleen McMahon
Senior United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Connolly, et al.*, No. 16 Crim. 0370

Dear Judge McMahon:

On behalf of Defendant Matthew Connolly in the above-captioned matter, we respectfully request permission for Mr. Connolly to travel to Delaware from February 22 through March 6, 2022.

On January 27, 2022, the Second Circuit filed its opinion in the above-captioned case, reversing all counts of conviction for Mr. Connolly and remanding all counts to this Court for entry of judgments of acquittal. While the Second Circuit's opinion reversed all counts of conviction for Mr. Connolly, the pretrial and bail-related restrictions remain, including domestic travel restrictions. It remains unknown whether the government will request a rehearing in this matter, but its time to do so has been extended until March 14, 2022.

We have raised this travel request with Department of Justice attorney Sangita Rao, who confirmed that the government does not object. Because Mr. Connolly was granted release pending appeal by this Court, Probation previously determined that it will not monitor Mr. Connolly. As a result, Probation is not taking a position regarding this travel request.

Mr. Connolly's conditions of release currently permit him to travel to the Southern District of New York, the Eastern District of New York, New Jersey, and Pennsylvania. Mr. Connolly requests permission to travel outside of this geographical limitation for a visit to Delaware to see family. Mr. Connolly would travel by car on February 22, 2022 and stay at the home of his family member, returning March 6, 2022. We plan to separately seek a Modification of Mr. Connolly's Conditions of Release from this Court, but the government is still evaluating its position in that regard.

Mr. Connolly has been fully compliant with the conditions of his release, including several previously-authorized trips. Mr. Connolly recorded a notarized Affidavit of Confession of Judgment securing his Appearance Bond of \$500,000 against his home in Somerset County, New Jersey. He does not pose a flight risk.

Thank you for your consideration.

Sincerely,

/s/ Phara A. Guberman

Phara A. Guberman
of PAUL HASTINGS LLP

cc: Counsel for the Department of Justice (via ECF)